

**EXHIBIT 18**  
**July 30, 2019 Email from C.**  
**McCracken to D. Kocan**  
**REDACTED VERSION**

Lee, Lisa S.

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**From:** McCracken, Casey J. <CMcCracken@gibsondunn.com>  
**Sent:** Tuesday, July 30, 2019 10:37 AM  
**To:** Kocan, David R.; Hill, Zachary Scott; Polito, John A.; brichardson@bsflp.com; srodriguez@bsflp.com; ajensen@bsflp.com; Smith, Benjamin P.; kdunn@bsflp.com; Smith, Sharon R.; wisaacson@bsflp.com; gschlabach@bsflp.com; sungar@bsflp.com; tle@bsflp.com; khartnett@bsflp.com; rpocker@bsflp.com; Minne, Jacob J.O.; Lee, Lisa S.  
**Cc:** AMcKonly@gibsondunn.com; bevanson@gibsondunn.com; BLong@gibsondunn.com; CWhittaker@gibsondunn.com; EVandevælde@gibsondunn.com; jgorman@gibsondunn.com; JTryck@gibsondunn.com; JTThomas@gibsondunn.com; mperry@gibsondunn.com; SLiversidge@gibsondunn.com; TMorgan2@gibsondunn.com; Thompson, Arlene R.; CWeaver@gibsondunn.com; SMathur@gibsondunn.com; JChristiansen@gibsondunn.com  
**Subject:** RE: Rimini I -- Correspondence re Document Custodians

Counsel-

Thank you for the email. Below, we respond briefly to each of the bullets you raised in your email.

- **Dev Instructions.** First, we must correct your email: Rimini's Supplemental Response to Interrogatory No. 1 did not identify Dev Instructions as [REDACTED]. Second, Dev Instructions are clearly not responsive to Oracle's Supplemental RFPs 1 or 4. RFP 1 calls for documents concerning changes Rimini made in response to the injunction. [REDACTED] RFP 4 calls for programs developed in response to the Injunction. The Dev Instructions [REDACTED]. Just as technical specifications are not responsive to either of these RFPs, neither are Dev Instructions. Third, RFP 3 calls for documents "provided" to clients, focusing primarily on client deliverables, updates provided to clients, and documentation for those updates. (See RFP 3: "All Documents Rimini provided to its customers in connection with its support of Oracle Software and Support Materials since November 5, 2018, including without limitation tax and regulatory updates, break fixes, new functionality, documentation, or any other files."). Dev Instructions [REDACTED] (which Oracle knows about from *Rimini II*, but did not request until July 23, 2019). It is our understanding that some Dev Instructions [REDACTED], and thus there may be some subset of Dev Instructions that would fall broadly within the letter (though, not the spirit) of RFP 3, as framed. Given the RFP's focus on client deliverables and based on Rimini's burden objections, Rimini informed Oracle through its response to RFP 3 that it would produce [REDACTED] which does not include any Dev Instructions [REDACTED], assuming those could be identified.

However, on July 23, 2019, Oracle, for the first time, served a request that calls for all Dev Instructions. There is, therefore, no need for the parties to debate the scope of RFP 3 or for Rimini to parse through which Dev Instructions were sent to client environments and which were not. Rimini will produce all final Dev Instructions for updates or fixes after November 5, 2018. We are working on collecting those, and will produce them as soon as that collection and review is complete, notwithstanding that they were only recently requested.

- **Other Updates.** Rimini is continuing to work on collecting updates and fixes within its possession, custody, or control. To be clear, Rimini is not "refusing to produce documents from customer environments and cloud